

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE DIVISION

KANE MARCEAUX, ET AL.

CIVIL ACTION NO: 6:12-cv-01532

VERSUS

JUDGE RICHARD T. HAIK, SR.

LAFAYETTE CITY-PARISH CONSOLIDATED  
GOVERNMENT, ET AL

MAGISTRATE JUDGE PATRICK J. HANNA

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**AFFIDAVIT OF CHIEF JAMES "JIM" CRAFT**  
**POIENCOT, CORMIER, THOMPSON MOTION FOR SUMMARY JUDGMENT**

STATE OF LOUISIANA

PARISH OF LAFAYETTE

**BEFORE ME**, Notary Public, personally came and appeared:

CHIEF JAMES "JIM" CRAFT

who, after being first duly sworn, did depose and say, based on his own personal knowledge, that:

1.

I am a Defendant in the above-captioned matter and am competent to testify as to the allegations asserted by Plaintiffs.

2.

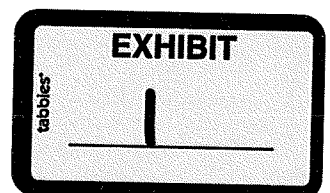
I am the Chief of Police for the Lafayette Police Department and have served in that capacity since 2006.

3.

The provisions of the LPD General Orders ("G.O.") attached to the Motion for Summary Judgment filed on my behalf as Appendices I – VIII (G.O. 101.1, 101.3, 201.2, 204.5, 301.9, 301.10, and 305.1)) are true and correct copies of same.

4.

I did **not** receive notice of Plaintiffs' Petition for Temporary Restraining Order and Injunction filed in the Fifteenth Judicial District, Lafayette, Louisiana (Docket No. 2012-2889) on May 22, 2012.



5.

On May 29, 2012, I learned that Plaintiff, Scott Poencot, had been secretly recording his fellow and superior officers since 2006. Shortly thereafter, I learned that several other Plaintiffs routinely surreptitiously recorded and/or video-taped their interactions with fellow and superior officers.

6.

On or about May 8, 2012, I learned that someone with access to a confidential shift-level investigative file leaked a confidential document to attorney, Olita Magee. Ms. Magee attached a copy of the confidential document to a brief filed with the Lafayette Municipal Fire & Police Civil Service Board.

7.

On or about May 11, 2012, CAO Dee Edward Stanley and Major George Jackie Alfred, as my designees in my absence (per G.O. 301.9), ordered an investigation into the source of the leaked document.

8.

I assigned Lieutenant Dwayne Prejean, Internal Affairs, to conduct the investigation.

9.

After the Internal Affairs investigation revealed that Greg Cormier had taken the document in question from a confidential shift-level investigative file, whited out certain information, and given it to Scott Poencot, Cormier and Poencot were terminated. Cormier failed his polygraph and Poencot refused to consent. Poencot's refusal to consent to the required polygraph also contributed to his termination, as did his participation in Gabe Thompson's secret recording of Major Alfred on April 19, 2012 which was later released to the media.

10.

Prior to Plaintiffs' Petition for Temporary Restraining Order filed in State Court, I planned department-wide transfers with the intent of making transferred officers more well-rounded and better prepared for future promotions. By Internal Memorandum of May 22, 2012, eleven lieutenants and eight sergeants were transferred, effective June 10, 2012. (Exhibit 1 hereto). By email Memorandum on May 25, 2012, one patrol officer and three corporals were transferred. (Exhibit 2 hereto).

11.

The foregoing transfers were in no way retaliatory. It was my reasonable belief that these transfers were reasonable and would make the Department more efficient and effective for the citizens of Lafayette.

10.

The LPD maintains a strict confidentiality policy, set forth in G.O. 204.5. (Poencot, Cormier, and Stelly Motion for Summary Judgment, Appendix IV)

11.

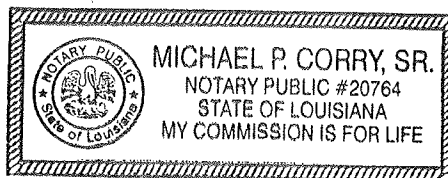
LPD relies on members of the public to provide critical information, to serve as witnesses, to respect law enforcement authority, and to provide financial support. The public's support and confidence is critical to the proper functioning of the LPD.

  
CHIEF JAMES "JIM" CRAFT

SWORN TO AND SUBSCRIBED before me this 22<sup>nd</sup> day of May, 2014.

  
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NOTARY PUBLIC

PRINT NAME: Michael P. Corry Notary #: 20764





**LAFAYETTE CONSOLIDATED GOVERNMENT  
INTERNAL MEMORANDUM**

*Lafayette Police Department  
Division of Administration (310)  
[jcraft@lafayetteLA.gov](mailto:jcraft@lafayetteLA.gov)*

Office: 291-8653

Fax: 291-5665

**TO: ALL POLICE PERSONNEL**

**THRU:**

**FROM: Chief Jim Craft, 8653**

**SUBJ: Personnel Transfers**

**DATE: May 22, 2012**

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**EFFECTIVE SUNDAY, JUNE 10, 2012, THE FOLLOWING TRANSFERS WILL BE MADE:**

**Lt. Gabe Thompson**, relieved of duty Patrol Division-Precinct 3-Administrative Assistant under the supervision of Capt. Norbert Myers, transferred to Patrol Division-Precinct 4-Administrative Assistant under the supervision of Capt. Cornell Montgomery.

**Lt. Joseph "Chris" Lange**, relieved of duty Patrol Division-Precinct 4-Shift B, Shift Lieutenant under the supervision of Capt. Cornell Montgomery, transferred to Patrol Division-Precinct 1-Shift A-Shift Lieutenant under the supervision of Capt. McCullan Gallien.

**Lt. Andy Fontenot**, relieved of duty Patrol Division-Precinct 2-Shift A, Shift Lieutenant under the supervision of Capt. Ned Fowler, transferred to Patrol Division-Precinct 2-Administrative Assistant under the supervision of Capt. Ned Fowler.

**Lt. Phil Fontenot**, relieved of duty Patrol Division- Precinct 2-Administrative Assistant under the supervision of Capt. Ned Fowler, transferred to Patrol Division-Precinct 2-Shift A, Shift Lieutenant under the supervision of Capt. Ned Fowler.

**Lt. Nolvey Stelly**, relieved of duty Patrol Division-Precinct 3- Shift B, Shift Lieutenant under the supervision of Capt. Norbert Myers, transferred to Patrol Division-Precinct 3-Administrative Assistant under the supervision of Capt. Norbert Myers.

**Lt. Mike Stelly**, relieved of duty Patrol Division-Precinct 3- Shift C, Shift Lieutenant under the supervision of Capt. Norbert Myers, transferred to Patrol Division-Precinct 3-Shift B, Shift Lieutenant under the supervision of Capt. Norbert Myers.

**Lt. Randy Miller**, relieved of duty Patrol Division-Precinct 1-Shift D, Shift Lieutenant under the supervision of Capt. McCullan Gallien, transferred to Patrol Division-Precinct 3-Shift C, Shift Lieutenant under the supervision of Capt. Norbert Myers.

**Lt. Bryan Racca**, relieved of duty Patrol Division-Precinct 4-Shift C, Shift Lieutenant under the supervision of Capt. Cornell Montgomery, transferred to Patrol Division-Precinct 1-Shift D, Shift Lieutenant under the supervision of Capt. McCullan Gallien.

**Lt. Greg Cormier**, relieved of duty Patrol Division-Patrol Support under the supervision of Capt. Ron Czajkowski, transferred to Patrol Division-Precinct 4-Shift C, Shift Lieutenant under the supervision of Capt. Cornell Montgomery.

**Lt. Paul Taylor**, relieved of duty Patrol Division-Precinct 1-Shift A, Shift Lieutenant under the supervision of Capt. McCullan Gallien, transferred to Patrol Division-Precinct 1-Shift B, Shift Lieutenant under the supervision of Capt. Cornell Montgomery.

**Lt. Jim Marsh**, relieved of duty Patrol Division-Precinct 4-Administrative Assistant under the supervision of Capt. Cornell Montgomery, transferred to Patrol Division-Patrol Support under the supervision of Capt. Ron Czajkowski

**Sgt. Randy Leger**, relieved of duty Patrol Division-Precinct 3-Shift A-Field Supervisor under the supervision of Capt. Norbert Myers, transferred to Patrol Division-Precinct 1-Shift D-Field Supervisor under the supervision of Capt. McCullan Gallien.

**Sgt. Greg Randell**, relieved of duty Patrol Division-Precinct 2-Shift B-Field Supervisor under the supervision of Capt. Ned Fowler, transferred to Patrol Division-Precinct 2-Shift A-Field Supervisor under the supervision of Capt. Ned Fowler.

ALL POLICE PERSONNEL | 3  
Re: Personnel Transfers

**Sgt. Brent Taylor**, relieved of duty Patrol Division-Precinct 2-Shift D-Field Supervisor under the supervision of Capt. Ned Fowler, transferred to Patrol Division-Precinct 2-Shift B-Field Supervisor under the supervision of Capt. Ned Fowler.

**Sgt. Michael Onezime**, relieved of duty Patrol Division-Precinct 2-Shift A-Field Supervisor under the supervision of Capt. Ned Fowler, transferred to Patrol Division-Precinct 2-Shift D-Field Supervisor under the supervision of Capt. Ned Fowler.

**Sgt. Dwayne Bertrand**, relieved of duty Patrol Division-Precinct 3-Shift B-Field Supervisor under the supervision of Capt. Norbert Myers, transferred to Patrol Division-Precinct 3-Shift A-Field Supervisor under the supervision of Capt. Norbert Myers.

**Sgt. Dewitt Sheridan**, relieved of duty Patrol Division-Precinct 1-Shift D-Field Supervisor under the supervision of Capt. McCullan Gallien, transferred to Patrol Division-Precinct 3-Shift B-Field Supervisor under the supervision of Capt. Norbert Myers.

**Sgt. Jimmie Richard**, relieved of duty Patrol Division-Precinct 4-Shift D-Field Supervisor under the supervision of Capt. Cornell Montgomery, transferred to Patrol Division-Precinct 4-Shift C-Field Supervisor under the supervision of Capt. Cornell Montgomery.

**Sgt. David LeBlanc**, relieved of duty Patrol Division-Precinct 4-Shift C-Field Supervisor under the supervision of Capt. Cornell Montgomery, transferred to Patrol Division-Precinct 4-Shift D-Field Supervisor under the supervision of Capt. Cornell Montgomery.

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JIM CRAFT  
CHIEF OF POLICE

JC/jvl

*Recorded*

**Jeanette Luque**

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**From:** Jim Craft  
**Sent:** Friday, May 25, 2012 5:25 PM  
**To:** PD - Officer Email List; PD Civilian Employees  
**Subject:** Transfers (May 27 & June 10)

**Effective Sunday, May 27, 2012, the following transfer will be made:**

**PO Zarrick Guillory**, relieved of duty Service Division- FTO Trainee under the supervision of Lt. Kim Gates, transferred to Patrol Division- Precinct 3- Shift C under the supervision of Capt. Norbert Myers.

**Effective Sunday, June 10, 2012 the following transfers will be made:**

**Cpl. Daryl Boudreaux**, relieved of duty Precinct 4- Shift A under the supervision of Capt. Cornell Montgomery, transferred to Patrol Support- Downtown Unit under the supervision of Capt. Ron Czajkowski.

**Cpl. Bridget Karn**, relieved of duty Patrol Division- Precinct 3- Shift D under the supervision of Capt. Norbert Myers, transferred to Patrol Division- Precinct 3- Resource Officer under the supervision of Capt. Norbert Myers.

**Cpl. Scott Poencot**, relieved of duty Patrol Division- Precinct 3- Resource Officer under the supervision of Capt. Norbert Myers, transferred to Patrol Division- Precinct 4, Shift C under the supervision of Capt. Cornell Montgomery.

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**JIM CRAFT**  
**CHIEF OF POLICE**